

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
JEFFREY R. LARISON	:	
	:	
Debtor	:	BANKRUPTCY NO. 21-12858 mdc

WELLS FARGO BANK d/b/a	:	
WELLS FARGO AUTO	:	
Movant	:	
JEFFREY R. LARISON	:	
and KENNETH E. WEST	:	
Respondents	:	

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF WELLS FARGO BANK d/b/a
WELLS FARGO AUTO**

Debtor, by and through Joseph F. Claffy, Esquire, his attorney, contests the Motion for Relief sought by Movant and in support thereof avers as follows:

1. Admitted.
2. Admitted although it is unclear as to whether the actual movant is regarded as a Federally Insured Banking institution under the Code.
3. Denied.
4. Admitted.
5. Admitted.
6. Denied. The validity and extent of the security interest is denied.
7. Denied. Debtor states that the value is much less than stated and will be proven at time of trial.
8. Admitted.
9. Admitted.
10. Denied. Strict proof of each charge demanded at trial.
11. Denied. Debtor may be seeking to avoid the lien to the value of the vehicle in this case and is in the process of valuing the vehicle.
12. Denied that relief is appropriate.
13. Denied that creditor lacks adequate protection. Denied that there is inconsequential

equity of the debtor. Denied that the debtor's work truck is unimportant to his reorganization under the code.

WHEREFORE, respondent debtor requests that the court deny the motion.

Respectfully submitted:

/s/ Joseph F. Claffy
Joseph F. Claffy
Attorney for Debtor I.D. No. 35142
26 South Church Street
West Chester, PA 19382
610 429-0900